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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:  
  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DEFENDANT UBER TECHNOLOGIES,  
INC., RAISER, LLC, AND RAISER-CA,  
LLC'S BRIEF IN SUPPORT OF UBER'S  
PRIVILEGE CLAIMS CHALLENGED BY  
PLAINTIFFS FOR THE CHANG,  
SHERIDAN, AND TWOMEY  
CUSTODIAL FILES – PURSUANT TO  
SPECIAL MASTER ORDER NO. 3 (DKT.  
2472)**

DEFENDANTS' BRIEF IN SUPPORT OF UBER'S PRIVILEGE CLAIMS CHALLENGED BY PLAINTIFFS FOR  
THE CHANG, SHERIDAN, AND TWOMEY CUSTODIAL FILES – PURSUANT TO SPECIAL MASTER ORDER  
NO. 3 (DKT. 2472)

Case No. 3:23-MD-3084-CRB

Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in support of their position on the remaining privilege challenges for custodians Frank Chang, Danielle Sheridan, and Pat Twomey. On March 25, 2025, Plaintiffs challenged approximately 156 documents for the three custodians at issue in this brief. Through conferrals, the parties have narrowed their dispute to 33 challenges for the Sheridan custodial file and 78 documents for the Chang custodial file. These challenges are now submitted for the Special Master's review. The parties have no remaining dispute concerning the documents in the Twomey file.<sup>1</sup>

Defendants incorporate by reference the legal standard and arguments set forth in their prior briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the applicable legal standard and the factual material previously provided to the Special Master,<sup>2</sup> when reviewed in conjunction with the challenged documents and the associated metadata fields, support Uber's privilege and work product assertions. The remaining privilege claims submitted for the Special Master's determination should be upheld.

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<sup>1</sup> Defendants are not including in this count the challenges that Plaintiffs asserted for the first time on April 8 and 9, 2025, and that, over Defendants' objections, Plaintiffs submitted to the Special Master for consideration on April 10, 2025. Per the Special Master's April 12, 2025 direction, the Chang and Sheridan challenges that Plaintiffs asserted on April 8 and 9 will not be considered with this submission; instead, they will be included in the challenges for custodians whose depositions have already passed.

<sup>2</sup> As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and (3) a digest of third-parties present in its privilege log. Defense counsel will also be available for any questions the Special Master may have during the review process.

1 DATED: April 14, 2025

Respectfully submitted,

2 **SHOOK, HARDY & BACON L.L.P.**

3 By: /s/ Maria Salcedo

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Maria Salcedo  
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